UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DR. MORGAN REYNOLDS ON BEHALF OF THE UNITED STATES OF AMERICA,

Plaintiff/Relator,

-against-

SCIENCE APPLICATIONS INTERNATIONAL, CORP.; APPLIED RESEARCH ASSOCIATES, INC.; BOEING; NUSTATS; COMPUTER AIDED ENGINEERING ASSOCIATES, INC.; DATASOURCE, INC.; GEOSTAATS, INC.; GILSANZ MURRAY STEFICEK LLP; HUGHES ASSOCIATES, INC.; AJMAL ABBASI; EDUARDO KAUSEL; DAVID PARKS; DAVID SHARP; DANIELLE VENEZANO, JOSEF VAN DYCK; KASPAR WILLIAM; ROLF JENSEN & ASSOCIATES, INC.; ROSENWASSER/GROSSMAN CONSULTING ENGINEERS, P.C.; SIMPSON GUMPERTZ & HEGER, INC.; S.K. GHOSH ASSOCIATES, INC.; SKIDMORE, OWINGS & MERRIILL, LLP; TENG & ASSOCIATES, INC.; UNDERWRITNERS LABORATORIES, INC.; WISS, JANNEY, ELSTNER ASSOCIATES, INC.; AMERICAN AIRLINES: SILVERSTEIN PROPERTIES; AND UNITED AIRLINES.

07 CIV 4612 (GBD)(DF)

NOTICE OF MOTION

Defendants.

PLEASE TAKE NOTICE, that upon the accompanying Declaration of Philip Touitou, Esq. and the accompanying Memorandum of Law, defendants WISS, JANNEY, ELSTNER ASSOCIATES, INC. ("WJE") and ROLF JENSEN & ASSOCIATES, INC. ("RJA"), will move this Court, on a date and time determined by the Court, before the Honorable George B. Daniels in the United States District Courthouse for the Southern District of New York, 500 Pearl Street, New York, New York, for the imposition of sanctions against Relator and his attorney herein pursuant to Fed. R. Civ. P. 11 and § 3730(d)(4) of the False Claims Act for the reasons set forth in the motion papers submitted by co-defendants UNDERWRITERS LABORATORIES, INC. ("UL") and APPLIED RESEARCH ASSOCIATES, INC. ("ARA") which are adopted and

incorporated herein, and for such other and further relief in favor of defendants WJE and RJA as the Court may deem just and proper.

Dated: New York, New York February 5, 2008

Respectfully submitted,

HINSHAW & CULBERTSON LLP

By: Philip Tolkton (PT-4302)

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